

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	Crim. No. 17-201-01 (ABJ)
PAUL J. MANAFORT, JR.,)	
)	
Defendant.)	

DEFENDANT PAUL J. MANAFORT, JR.'S MOTION FOR
LEAVE TO FILE UNDER SEAL MOTION
FOR RECONSIDERATION OF CONDITIONS OF RELEASE

Defendant Paul J. Manafort, Jr., by and through counsel, hereby moves for leave to file under seal this renewed motion for reconsideration of conditions of release per the Court's sealed Order dated April 9, 2018. (Dkt. # 259) (filed under seal). The basis for sealing this motion remains the same as for the original motion for reconsideration and the supplemental filings, which the Court previously granted.

The general policy is that public access to judicial proceedings and judicial records is important to the proper functioning of our justice system; however, there is good cause and compelling reasons in this instance to seal the renewed motion for reconsideration of conditions of release. More particularly, the defendant is seeking reconsideration of the conditions of release identified in the December 15, 2017 Order. On April 9, 2018, the Court denied without prejudice the defendant's previous renewed motion for reconsideration. *Id.* at 1. The defendant proposes a modified bond package in line with the Court's previous orders. To do so, the submission of additional materials containing sensitive financial information, personal addresses, etc., is required for the Court to evaluate the conditions of release under 18 U.S.C Section 3142 and determine the least

restrictive conditions that will reasonably assure the defendant's appearance as required.

See United States v. Xulum, 84 F.3d 441, 443 (D.C. Cir. 1996) (per curiam).

Finally, should the Court grant this sealed motion, the defendant will submit a redacted version of the motion on the public record in accordance with the Court's previous guidance.

WHEREFORE, the defendant moves for leave to file under seal this renewed motion for reconsideration of conditions of release, including its attachments.

Dated: May 9, 2018

Respectfully submitted,

/s/

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